

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as a
candidate for U.S. Senate, ANDY KIM
FOR NEW JERSEY, SARAH
SCHOENGOOD, SARAH FOR NEW
JERSEY, CAROLYN RUSH and
CAROLYN RUSH FOR CONGRESS

Civil Action. No.: 3:24-1098 (ZNQ)(TJB)

Plaintiffs,

v.

**CERTIFICATION OF NICOLE
NOLLETTE**

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, et. al.,

Defendants.

- and -

DALE A. CROSS, in his official capacity as
Salem County Clerk, et al.,

as Interested Parties.

I, NICOLE NOLLETTE, being of full age, hereby certify as follows:

1. I am the Executive Vice President of Operations at Dominion Voting Systems, Inc. (“Dominion”) and have been in this role for over seven years.
2. I have personal knowledge of some of the matters stated herein and the remainder are based upon my discussions with other Dominion employees. The statements contained herein are true and accurate to the best of my knowledge.
3. Dominion provides voting system hardware, software, and related services to its customers.

4. I am familiar with the products and services Dominion provides at the request of and under the supervision of Dominion's customers in the state of New Jersey, including Bergen, Burlington, Cumberland, Essex, and Mercer Counties (the "Counties").

5. For purposes of this certification, the phrase "Ballot Programming Services" refers to the process of (i) programming voting machine software to reflect the ballots drawn by the Counties' Clerks; (ii) the programming of election media, including SD cards, USB drives, poll worker cards, technician cards, and iButtons; and (iii) loading the election files onto the voting equipment. Ballot Programming Services do not include Logic and Accuracy Testing or shipping equipment, which are separate processes conducted by each of the Counties.

6. The Counties have each requested that Dominion provide Ballot Programming Services related to their respective upcoming primary elections. Dominion has agreed to provide Ballot Programming Services under the supervision of each of the Counties.

7. Dominion has been asked to provide an estimate of approximately how long it will take to complete Ballot Programming Services for each of the Counties. Dominion provides support services to a number of customers and must plan for and allocate resources ahead of time to the provision of these services.

8. The creation of a precise timeline for the completion of Ballot Programming Services for the Counties generally involves an iterative process between each County and Dominion, generally beginning with a firm start date for the Ballot Programming Services work. Each County manages their Ballot Programming Services process and provides supervision, direction and feedback throughout. Each County also controls access to any County facilities or equipment, including that County's voting equipment. Dominion has neither visibility into nor

control over many factors, including work performed by other vendors, that may impact the Ballot Programming Services timeline.

9. Dominion has been asked to provide an estimate for how long it will take to complete the Ballot Programming Services. Based on Dominion's prior experience and the information available to Dominion at this time, Dominion estimates that it will take approximately four to six weeks to complete the Ballot Programming Services once the Counties' Clerks provide Dominion with final ballot designs and instruct Dominion to begin Ballot Programming Services. This estimate assumes Ballot Programming Services work for all five of the Counties will begin on the same day. This estimate additionally assumes that each County provides a ballot design to Dominion that is compatible with the voting system hardware and software currently in use by that County.

10. Because Dominion provides services to several customers at once, Dominion requires advance notice of when customers require support services so that it can appropriately plan and allocate resources. The estimated timeline above assumes that Dominion will be provided with advance notice of the date upon which the Counties will request that Dominion begin providing Ballot Programming Services and that the Counties will provide Dominion with all necessary instructions and supervision throughout the entire process.

11. The amount of time needed for Dominion to complete Ballot Programming Services would be impacted by changes in the ballot design or election project content that occur after Dominion has begun providing Ballot Programming Services.

I certify that the foregoing statements made by me are true.



Dated: March 6, 2024